

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

EZRA SMITH,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.
)	1:24-cv-05158-TWT
v.)	
)	
DEPUTY MONIQUE TRACEY,)	
DEPUTY RAUL GOMEZ, DEPUTY)	
SHENEQUA JACKSON, and ERICA)	
SANCHEZ,)	
)	
Defendants.)	

**DEFENDANT ERICA SANCHEZ’S
MOTION FOR SUMMARY JUDGMENT**

Defendant Erica Sanchez files her Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56 and L.R. 56.1. In support of this Motion, Defendant Sanchez submits the following:

1. As to Count II, which is the only claim involving Defendant Sanchez, there are no genuine issues of material fact, and as a matter of law, judgment should be entered in Ms. Sanchez’s favor. There is no admissible evidence that shows Defendant Sanchez had actual knowledge of a strong likelihood that Plaintiff would self-harm; that there was even a mere possibility of self-harm that Defendant Sanchez disregarded the information in a manner that exhibits more

than mere negligence – they show that Defendant Sanchez did not have time to act.

2. Defendant Sanchez relies on her Brief in Support of Motion for Summary, Statement of Material Facts Not Issue, and the exhibits attached to her brief.

Respectfully submitted this 9th day of December, 2025.

/s/Antonio E. Veal

Michael G. Frankson

Georgia Bar No.: 173835

Antonio E. Veal

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that the foregoing DEFENDANT ERICA SANCHEZ'S MOTION FOR SUMMARY JUDGMENT was electronically filed using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

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Respectfully submitted this 9th day of December, 2025.

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